Regulatory Requirements for Residential Door-to-Door Programs

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What is Household Hazardous Waste?

HSC §25218.1 (e) "Household hazardous waste" means any hazardous waste generated incidental to owning or maintaining a place of residence. Household hazardous waste does not include any waste generated in the course of operating a business concern at a residence.

What is a Household?

HSC § 25218.1 (d) "Household" means a single detached residence or a single unit of a multiple residence unit and all appurtenant structures.

What is a Door to Door HHW Program?

HSC section 25218.1(c)

"Door-to-door household hazardous waste collection program" or "household hazardous waste residential pickup service" means a program operated by a public agency, or its contractor, that collects household hazardous waste from individual residences, and transports that waste in an inspected and certified hazardous waste transport vehicle * to an authorized household hazardous waste collection facility.

^{*}Registered HW Transporter

What is an HHW Collection Facility

HSC 25218.1 (f) "Household hazardous waste collection" facility" means a facility operated by a public agency, or its contractor, for the purpose of collecting, handling, treating, storing, recycling, or disposing of household hazardous waste. HHW collection facilities include permanent household hazardous waste collection facilities, temporary household hazardous waste collection facilities, recycle-only household hazardous waste collection facilities, curbside household hazardous waste collection programs, and mobile household hazardous waste collection facilities.

Statutory Requirements

- HSC §25218.5(e) A door-to-door household hazardous waste collection program or household hazardous waste residential pickup service shall meet all of the following conditions:
- (1) The transported household hazardous waste shall be in closed containers and packed in a manner that prevents the containers from tipping, spilling, or breaking during transport.
- (2) Different household hazardous wastes shall not be mixed within a container before or during transport.

 A door-to-door household hazardous waste collection program or household hazardous waste residential pickup service is exempt from the requirements of Section 25160 regarding the use of a manifest when transporting household hazardous waste collected from individual residences to an authorized hazardous waste collection facility. In lieu of a manifest, a receipt shall be issued for the household hazardous waste collected from an individual residence, and a copy of the receipt shall be retained by the public agency for a period of at least three years.

Door-To-Door Only Programs

- Must establish a Permanent Program
 - Either a site where waste is consolidated and picked up by a registered transporter and taken to a TSDF.
 - Or waste does not leave the vehicle until delivered to a TSDF or formally transferred to another Transporter.



 Each local agency must complete all sections of the Permit By Rule notification/application for a HHW collection facility and submit these forms to the local Certified Unified Program Agency (CUPA). The operation plan submitted with the application must detail how the waste is handled, and by whom, from the time the resident calls for a pickup and the waste is collected from the residence, through the waste being transported to an authorized treatment, storage, disposal facility (TSDF). The local CUPA must approve the notification/application.

 Each local agency must have a unique EPA Identification Number to be used on the manifest when the waste is picked up from the residence. When the load is complete, the HHW must be transported and delivered to an authorized TSDF(s) under manifest(s) begun during the initial pick up. The HHW may not be transported to an "exempt transfer station" or any other point and rebulked or remanifested.

 If a contractor picks up HHW from multiple jurisdictions in one load, manifesting for each jurisdiction must be kept separate even though the waste from the different jurisdictions may be combined as to type (e.g. all the used oil can be bulked into one container while at the residence but a separate manifest must be completed for each jurisdiction).